

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: SEIZURE OF

LADY'S SIGNED TIFFANY & CO.
PLATINUM DIAMOND
ENGAGEMENT RING
(CATS No. 16-DEA-620994)

Misc. Case No.

16 MC 053

JUDGE

JUDGE ADAMS

STIPULATION TO EXTEND TIME
FOR THE UNITED STATES TO
FILE A JUDICIAL COMPLAINT IN
FORFEITURE

The parties to the above-referenced matter, the United States of America and Claimant Robert Lin (hereinafter collectively referred to as the "Parties"), each by undersigned counsel, or by authorized representative, agree as follows:

1. The above-captioned asset, LADY'S SIGNED TIFFANY & CO. PLATINUM DIAMOND ENGAGEMENT RING (CATS No. 16-DEA-620994) (hereinafter referred to as "the Seized Property"), was seized by the DEA on April 6, 2016, during the execution of a search warrant.

2. The Drug Enforcement Administration ("DEA") initiated administrative forfeiture proceedings against the Seized Property. Claimant Robert Lin filed a claim for the Seized Property on June 27, 2016. The DEA did not receive any further claims contesting the administrative forfeiture of the Seized Property.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States must file a judicial complaint in forfeiture against a seized asset not later than 90 days after a valid administrative claim for the seized asset is filed. However, 18 U.S.C. § 983(a)(3)(A) also provides that a court may extend the period for filing a complaint for good cause shown or upon agreement of the parties.

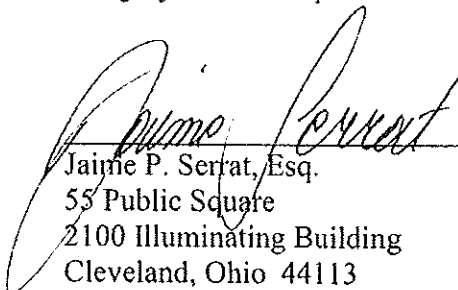
4. Pursuant to 18 U.S.C. § 983(a)(3)(A), and absent an extension of time, the deadline for the United States to file a judicial complaint in forfeiture with respect to the Seized Property is September 23, 2016.

5. Robert Lin is represented by Jaime P. Serrat, 55 Public Square, 2100 Illuminating Building, Cleveland, Ohio 44113. The Parties need additional time to discuss a possible resolution of the matter. Accordingly, the Parties wish to extend the time for the United States to file a judicial complaint in forfeiture against the Seized Property by 60 days, from September 23, 2016, to November 22, 2016.

STIPULATION TO EXTEND TIME FOR THE UNITED STATES TO FILE A JUDICIAL COMPLAINT IN FORFEITURE (Cont.)

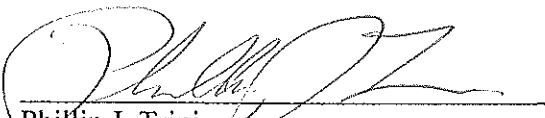
6. The persons signing this Stipulation to Extend Time warrant and represent that they possess full authority to bind the persons or entities on whose behalf they are signing and that they are unaware of any other potential claimants to the seized accounts.

7. With respect to the Seized Property, the Parties agree to an extension of the period for filing a judicial complaint in forfeiture to November 22, 2016.


Jaime P. Serrat, Esq.
55 Public Square
2100 Illuminating Building
Cleveland, Ohio 44113

Executed this 13th day of September, 2016.

Attorney for Claimant Robert Lin


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Executed this 13th day of September, 2016.

Attorney for the United States

IT IS SO ORDERED:

United States District Court Judge

Date